Remarks

Claims 1-10, 12-15, and 21-28 are pending in the present application. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Furthermore, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration and allowance are requested in view of the above amendments and the remarks below.

Claims 1-10, 12-15, and 21-28 are rejected under 35 U.S.C. 103(a) over Roberge et al (U.S. 6,381,611), hereafter "Roberge," in view of Peters et al. (U.S. 5,715,449), hereafter "Peters."

The rejection under 35 U.S.C. 103(a) over Roberge and Peters is defective because Roberge and Peters, taken alone or in combination, fail to disclose each and every feature set forth in the claims as required by 35 U.S.C. 103(a). Further, there is no motivation to combine the teachings of Roberge and Peters in the manner suggested by the Examiner.

Independent claim 1 recites:

> "A method for providing a compact interface for display of an object hierarchy having a plurality of levels, comprising:
> displaying a first level root node of the object hierarchy and navigation indicia indicating that the first level root node includes at least one second level child node in a first window;
> upon selection of the first level root node in the first window, displaying a pop-up window that includes a listing of all second level child nodes of the first level root node immediately adjacent and to a right side of the first level root node in the first window, wherein the pop-up window is not positioned directly below any portion of the first level root node; and
> selecting one of the second level child nodes from the listing of all second level child nodes included in the pop-up window;

wherein, upon selection of one of the second level child nodes, the pop-up window that includes the listing of all second level child nodes of the first level root node disappears from the first window, and is replaced by the selected second level child node, which is displayed immediately adjacent and to the right side of the first level root node in the first window, wherein the first level root node, the navigation indicia, and the selected second level child node are displayed in a linear horizontal arrangement in the first window, and wherein a depth of a navigation path through the object hierarchy increases from left to right in the first window."

Regarding independent claim 1, Roberge fails to disclose, *inter alia*, the features of "upon selection of the first level root node, displaying a **pop-up window** that includes a listing of all second level child nodes of the first level root node immediately **adjacent and to a right side** of the first level root node in the first window**, wherein the pop-up window is not positioned directly below any portion of the first level root node**," "selecting one of the second level child nodes from the listing of all second level child nodes included in the pop-up window," and "wherein, upon selection of one of the second level child nodes, the pop-up window that includes the listing of all second level child nodes of the first level root node disappears from the first window, and is replaced by the selected second level child node, which is displayed immediately adjacent and to the right side of the first level root node in the first window, **wherein the first level root node, the navigation indicia, and the selected second level child node are displayed in a linear horizontal arrangement in the first window**, and wherein a depth of a navigation path through the object hierarchy increases from left to right in the first window."

On the contrary, Roberge clearly discloses that the windows containing first and second level child nodes (e.g., buttons 82, 93) are displayed directly **below at least a portion of a previous level node**. See, for example, FIGS. 8 and 9 and col. 6, lines

25-30 ("buttons are displayed below the root node button …"). To this extent, unlike the present invention (see, e.g., FIG. 10), Roberge's system generates windows that take up a tremendous amount of real estate on a display (see, e.g., Roberge, FIG. 9).

In the Final Office Action, the Examiner argues in the Response to Arguments section that "Roberge teaches in at least column 6, lines 27-30 that the pop-up window is displayed at an offset to the right which would make it not displayed directly below the first level root node." However, contrary to independent claim 1, in Roberge, at least a portion of the pop-up window is displayed directly below the first level root node. Roberge, FIGS. 8 and 9 and col. 6, lines 25-30.

The Examiner asserts that Roberge "does not specifically mention that consecutive menu displays are displayed directly to the right to present a horizontal navigation that goes from left to right through a hierarchical tree model." Applicants agree. To overcome this glaring deficiency of Roberge, the Examiner relies on the disclosure of Peters. In particular, the Examiner asserts that "Peters teaches hierarchical navigation in a linear horizontal arrangement," and that "the modification of Peters into Roberge yields the end result of being able to change the layout of the presentation of Roberge from a vertical offset display to a horizontal right display of hierarchical menu elements." Applicants strenuously disagree with the Examiner's analysis and conclusion.

Roberge clearly teaches away from the use of, and disparages the compactness of, Peters' browser tree structure. As such, it would not be obvious to modify Roberge in view of Peters as suggested by the Examiner. For example, Roberge states with regard to Peters that: the interface is "unnecessarily wasteful of screen space"; "the

screen is cluttered with unselected choices at each of the levels that lie along the current branch"; and "navigation remains difficult because important navigational guides for moving back up the hierarchy – the nodes selected along the current path, for instance – are frequently hidden under a window or pushed off-screen entirely." Roberge, col. 2, lines 9-32. To this extent, one skilled in the art would not be motivated to modify Roberge in view of Peters as suggested by the Examiner.

Accordingly, Applicants submit that independent claim 1 is allowable. Further, Applicants submit that independent claims 9 and 21 are allowable for reasons similar to those set forth with regard to independent claim 1.

With respect to the dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent claims from which the claims depend. The dependent claims are believed to be allowable based on the above arguments, as well as for their own additional features.

If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

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